

1 know that the services are provided.

2 A Yes, like --

3 Q But you couldn't describe what the services are.

4 A In detail no. But I know they include payroll like,
5 you know, we saw the exhibit yesterday. Income, income tax
6 returns and accounts payable, etc.

7 MR. COHEN: If I can have a minute, Your Honor, I
8 think I'm finished.

9 JUDGE CHACHKIN: We'll go off the record.

10 (Off the record. Back on the record.)

11 JUDGE CHACHKIN: Mr. Cohen has concluded his cross-
12 examination. Mr. Shook.

13 MR. SHOOK: Thank you, Your Honor.

14 CROSS-EXAMINATION

15 BY MR. SHOOK:

16 Q Mr. Ramirez, please turn to Mass Media Exhibit
17 412 -- 7th binder.

18 (Pause.)

19 Q Now Mr. Ramirez, in your testimony you have made
20 reference to two meetings that you have attended in your
21 capacity as the director of National Minority TV. If I recall
22 correctly, the second meeting took place in your recollection
23 approximately a month after this April 20 meeting and that the
24 sole subject matter discussed at the second meeting concerned
25 the representation that NMTV was going to have the proceeding

1 in which we are now engaged.

2 Could you look at the last paragraph on the first
3 page, and tell us whether the subject matter that is reflected
4 in that last paragraph is what you recall being discussed at
5 the second meeting that you attended?

6 A I probably confused the day. I meant it had to do
7 with the same process that we're engaged. But you're right.
8 I mean the minutes are here. The --

9 Q Well --

10 A -- the term representation on, on the second one was
11 a waiver of a client-attorney privileges.

12 Q So there was a second meeting. And the subject
13 matter discussed at the second meeting was the --

14 A The waiver.

15 Q -- waiver of the attorney-client privilege?

16 A Yes.

17 Q Have you seen any minutes that were written up as a
18 consequence of the second meeting?

19 A I can't recall. I -- at this point. I'm sorry.

20 Q Do you know whether NMTV, National Minority TV, has
21 a local corporate attorney, a California attorney that does
22 work for it?

23 A Not that I know of. I think our attorneys are based
24 right here in Washington.

25 Q So the only attorneys that you're familiar with in

1 terms of NMTV having attorneys are the law firm of May and
2 Dunne and the law firm of which Mr. Topel is a part.

3 A Yes, sir.

4 Q Outside of the chief engineer or the NMTV station in
5 Portland are, do you know whether NMTV has an engineer?

6 A I am not aware of that.

7 Q During your tenure as a director of National
8 Minority, has it been brought to your attention what if any
9 applications or facilities of any kind are on file with the
10 FCC?

11 A Yes, I have received some documents, yes.

12 Q Can you tell us what documents it is that you've
13 received?

14 A Couldn't recollect right now.

15 Q Could you describe generally the subject matter of
16 those documents?

17 A Well, it has to do with available I believe stations
18 that we could apply for. I really at this point am not aware
19 fully.

20 Q Do you recall who sent those documents to you?

21 A I believe it was our attorneys or Mrs. Jane Duff.
22 Either one.

23 Q And do you recall approximately how long ago you
24 would have received the documents that you're just referring
25 to?

1 A It's been during my tenure. So after April. But
2 again I --

3 Q Was this a one-time --

4 A Yes.

5 Q Was this a one-time mailing or did, have you
6 received more than one --

7 A I think it's been a one-time.

8 Q Please refer to your testimony, specifically
9 paragraphs 7 and 8. And if you would -- if you'd like take a
10 minute just to read those again to bring yourself back in
11 time. Because the time period involved is when Translator TV,
12 Inc. was coming into being.

13 A Yes.

14 DR. RAMIREZ: I'm sorry. I don't know where my --

15 MR. TOPEL: Oh, it's 103, doctor, in that blue
16 volume --

17 DR. RAMIREZ: This, 103?

18 MR. TOPEL: Yeah, 103 is yours --

19 DR. RAMIREZ: Oh, okay. Thank you. I'm sorry, what
20 page?

21 MR. SHOOK: It's page 7, paragraphs 7 and 8.

22 DR. RAMIREZ: Um-hum.

23 BY MR. SHOOK:

24 Q When Mrs. Duff approached you about becoming a board
25 member, about the possibility of becoming a board member, did

1 you have any knowledge as to whether or not the company had
2 already been formed or whether it was simply an idea waiting
3 to happen?

4 A I can't recall specifically whether it was already
5 functioning or, or still in the making. I, I can't recall.

6 Q The paragraph does not give us any date or dates in
7 terms of when Mrs. Duff talked to you. Do you have any
8 knowledge or recollection as to when it was that Mrs. Duff
9 approached you and informed you the information which appears
10 in paragraph 7?

11 A Yes. I was told the beginning, early in the
12 beginning of the company or shortly before it was started. I
13 would assume it was shortly after it was started --

14 JUDGE CHACHKIN: No, no. That's not the question.
15 The question is --

16 DR. RAMIREZ: I'm sorry.

17 JUDGE CHACHKIN: -- do you have any idea of what
18 year --

19 DR. RAMIREZ: Oh, what year.

20 JUDGE CHACHKIN: -- we're talking about here.

21 DR. RAMIREZ: Oh, okay. 19 -- the best I could do
22 is '79 to '81.

23 MR. SHOOK: In --

24 DR. RAMIREZ: Or '82. I don't know.

25 BY MR. SHOOK:

1 Q In putting this, in putting this paragraph 7
2 together, did you have any documents to refer to, or did you
3 have any calendars to look at to help you to try to remember
4 when these events occurred?

5 A No. I just -- memory.

6 Q You have a memory of a sequence of events. And
7 these were some of the things that happened. But you --

8 A Yes.

9 Q -- couldn't tell us exactly when it happened.

10 A Pinpoint it, no.

11 Q When Mrs. Duff approached you about becoming a board
12 member, did you have any information or did you have any
13 awareness of who else was going to be on the board?

14 A No.

15 Q That subject was not discussed with you?

16 A No, and I did not ask for --

17 Q Did you have any, did you have any understanding as
18 to what the company was supposed to do?

19 A Again as I try to recall, you know, way back then,
20 it had to do with minorities and doing programming. And since
21 Mrs. Duff is a minority I probably, well, probably this would
22 be -- I start theorizing probably some programming for
23 Spanish-speaking people which I have done for many years.

24 Q So the understandings that you had essentially fell
25 into two categories. One that minorities were going to be

1 involved in some way and then secondly that there was going to
2 be a programming impact some, in some way.

3 A Yes. And that also by me being a minority it was
4 part of an effort by the government to get us involved in the
5 process.

6 Q Did you have any understanding as to what a
7 translator could do or was designed to do?

8 A Well, to translate to, pass on some programming,
9 repeat programming.

10 Q Did you have any understanding as to what
11 programming it was that Translator TV was going to use?

12 A Yeah, I was assuming that part of it at least would
13 be TBN.

14 Q Part of it was going to be TBN, and what was the
15 other part going to be?

16 A Then other possibilities that the board would have
17 to determine.

18 Q Did you have any discussion at that time with Mrs.
19 Duff about what if any applications were going to be filed
20 with the Federal Communications Commission?

21 A No. No, we didn't go that far.

22 Q Coming back to the present, before you became,
23 immediately before you became a board member at the April 20
24 meeting for which we have the, the minutes and which we just
25 went over, did you receive an agenda that told you what was

1 going to happen at the meeting?

2 A No, sir.

3 Q Were you advised in any way as to what was going to
4 happen at the meeting outside of the possibility of your being
5 elected to the board?

6 A No, sir.

7 Q Prior to the meeting that you have testified to when
8 the waiver of the attorney-client privilege was discussed, had
9 you been given any agenda as to what was going to take place
10 at that meeting?

11 A You mean the second board meeting?

12 Q Yes, sir.

13 A Just by phone.

14 Q Are you saying that by phone you were alerted as to
15 the subject matter --

16 A Yes, sir. Yes.

17 Q -- that was going to be discussed?

18 A Yes.

19 Q And for that second meeting did you have to travel
20 from the location to --

21 A From Los Angeles, from my home? Yes.

22 Q Yes, sir. So you, you traveled to the meeting, the
23 second meeting.

24 A Yes.

25 (Pause.)

1 Q Mr. Ramirez, on average since you have begun the
2 program that you have referred to in your testimony. And the
3 name of it right now escapes me. Oh, here it is. Our Town.
4 Since you have begun your involvement with the programming of
5 Our Town, approximately how much time do you spend at, at TBN
6 headquarters in any given month?

7 A One day from 8 to 5 on average.

8 Q One day a month?

9 A Yes.

10 Q And that's been pretty consistent for the last year
11 and a half?

12 A Yes. And I get to tape four programs, because we
13 are at once a week.

14 Q In your time at TBN headquarters do you normally
15 have occasion to see Mr. Norman Juggert?

16 A No. The only time that I saw him was at that first
17 meeting.

18 Q Do you have any understanding as to the maximum
19 number of full-power commercial television stations that
20 National Minority TV can own?

21 A I believe it's 12 or 14.

22 Q And how did you come to that understanding?

23 A In our conversations with the lawyers, our
24 attorneys.

25 Q In terms of the maximum number of stations that

1 National Minority TV can own, has any information been given
2 to you as to whether or not Mr. Paul Crouch can continue to
3 sit as a board member?

4 A The possibility has been discussed that in order for
5 us to pursue or this route it may be best that he not be a
6 part of the board. It has been discussed as a possibility.
7 Now I do not know all the ramifications or legalities whether
8 that is the road to take or not. But that has been a
9 consideration.

10 Q Do you recall when such discussions have occurred?

11 A In our talks with our attorneys in thinking what
12 would come out of this process and what may need to be done,
13 we just speaking about theories, you know. But nothing
14 officially --

15 Q That tells me in part who you, who was involved in
16 the discussion. I was asking when.

17 A In this discussion?

18 Q You can give me a rough time frame. It doesn't have
19 to be -- I'm not looking --

20 A When?

21 Q -- for a date. Yes, sir. I'm looking for
22 approximately when these discussions occurred.

23 A I think after we initially met with Mr. Topel as he
24 thought about, you know, the ramifications and or what things
25 could be done that has been tossed around as a possibility.

1 Q As the board is currently composed, what
2 understanding do you have as to the maximum number of
3 commercial full-power television stations that NMTV can have?

4 A Well, I believe because of Dr. Crouch being a part
5 of our board, and I think he's already completed 12, then that
6 may limit us. That is what I more or less understand. And
7 this is why the talk about perhaps Mr., Dr. Crouch not being
8 associated with NMTV.

9 Q What understanding do you have as to the number, the
10 approximate number of low-power television stations that
11 National Minority TV owns?

12 A I really don't know. I think it's about 10 low
13 powered I think.

14 Q Have you seen a listing of, of stations that --

15 A Somewhere, yes, yes, in the documents. But I'm not
16 sure.

17 Q What understanding do you have as to the programming
18 that those low-power stations use?

19 A In terms of what? What --

20 Q Well, in terms of the source of the --

21 A The source of -- TBN. And perhaps some local
22 programming. I need to do my research to be a more
23 responsible board member.

24 MR. SHOOK: Your Honor, we have no further
25 questions.

1 JUDGE CHACHKIN: Let me ask you about your
2 discussion with Mrs. Duff about becoming a member of the
3 board. And I'd like you to tell me in your own words what you
4 remember Mrs. Duff saying to you and what you said to her.

5 DR. RAMIREZ: Again, it's been many years. And in
6 my memory what registers is that this was an exciting
7 opportunity for minority people like myself and that the
8 government was very much interested in minorities being part
9 of the action, mainly getting into the mainstream of American
10 life.

11 JUDGE CHACHKIN: This is what was said to you. You
12 recall these words --

13 DR. RAMIREZ: Yes.

14 JUDGE CHACHKIN: -- or similar words being said to
15 you.

16 DR. RAMIREZ: Similar, yes. That -- and of course,
17 I probably ran away with it, and I said gee, you know, we
18 could do this and the other and thinking about California
19 being the greatest concentration of Hispanics and me being a
20 Hispanic and thinking of all the needs of our Hispanic
21 community in terms of education, crime and so on and so forth.

22 I was excited, but then the next question came and
23 are you a citizen. And that ended our discussion right there.
24 And --

25 JUDGE CHACHKIN: In, in her discussion with you she

1 | didn't say anything about what the source of the program would
2 | be, that TBN would be providing programming?

3 | DR. RAMIREZ: No. No. We did not discuss --

4 | JUDGE CHACHKIN: You didn't discuss that.

5 | DR. RAMIREZ: -- anything in detail. And as I said,
6 | the whole process was stopped at the point of her asking me
7 | whether I was a citizen and I was not.

8 | JUDGE CHACHKIN: How long did this conversation
9 | take?

10 | DR. RAMIREZ: Oh, gee, I don't think probably more
11 | than within an hour or less.

12 | JUDGE CHACHKIN: Any further cross-examination of
13 | this witness?

14 | MR. McCURDY: Yes, I --

15 | JUDGE CHACHKIN: Go ahead.

16 | CROSS-EXAMINATION

17 | BY MR. McCURDY:

18 | Q If we could turn back to Mass Media Exhibit 412.

19 | A Pardon me?

20 | Q 412.

21 | A 412.

22 | (Pause.)

23 | MR. COHEN: Let me help you, doctor. May I help
24 | you? I think you're in the right volume.

25 | DR. RAMIREZ: Yes, I have 7 now. Okay, thank you.

1 412. Oh, yes. Here it is. Thank you.

2 BY MR. McCURDY:

3 Q Okay, now you've looked at that for most of the day.

4 A Yes.

5 Q My question is now it was your understanding,
6 turning to the forgiving the Prime Time --

7 A Yes.

8 Q -- loan, it was your understanding that the, if the
9 debt was not forgiven by NMTV that Prime Time would go
10 bankrupt. Is that correct?

11 A Yes.

12 Q Now -- and it was also your understanding that if
13 the station, if the station went bankrupt, TBN programming
14 would no longer be carried by the Odessa station?

15 A Correct.

16 Q Now who provided you with this understanding?

17 A Within the discussion it was there.

18 Q Okay, but you don't remember specifically.

19 A Well, everybody participated in this discussion
20 except me, but I was just listening.

21 Q Okay. Now my question is did the board consider any
22 other options or were any other options discussed which would
23 allow TBN program to be continue to broadcast over that
24 station short of forgiving the loan to Prime Time?

25 A What I recall basically is that this was like coming

1 to the end of a process. And so this was not like we received
2 a letter yesterday and, well, let's say we forgive them. But
3 rather it was a process. And that we were at the end of the
4 process. Do we forgive it or not? Or we already explored
5 this and the other. I cannot tell what possibilities had been
6 discussed, because I do not know.

7 Q Okay. And did anyone inform you specifically of
8 what that process entailed?

9 A No. I did not ask, and I think that people that
10 were there had already known what the process had been except
11 me.

12 Q Okay. So you were just assuming there was some sort
13 of process?

14 A Yes. By the conversation that this was not
15 something that had been brought up for the first time at this
16 meeting.

17 Q And so there was no more discussion at this meeting
18 indicating that National Minority TV could reacquire the
19 Odessa station?

20 A I don't recall that.

21 Q And were -- do you remember being informed or there
22 being any discussion of whether Prime Time had made any
23 payment on its loan from --

24 A I don't know that it was brought up. I think it was
25 brought up that they had, they had attempted and -- or they

1 had basically said, you know, we, we are asked or forced to,
2 to pay, we're just going to close shop.

3 Q But you never saw any documents. Is that correct?

4 A No. No, I didn't.

5 Q Now you testified that one of the goals of National
6 Minority TV was to serve the minority community, correct?

7 That's what you --

8 A Yes.

9 Q And in conjunction to that, one of the goals was to
10 integrate minorities into the broadcast industry.

11 A Yes, sir.

12 Q Now do you -- was there any discussion or were you
13 aware if what the minority content of Prime Time Christian
14 Broadcasting was? Do you know if it was a minority-controlled
15 corporation?

16 A No, that I do not know. I had hardly any knowledge
17 of Prime Time, no.

18 Q And there was no -- okay.

19 JUDGE CHACHKIN: How did it financially benefit NMTV
20 to forgive the debt to Prime Time?

21 DR. RAMIREZ: Yes. I don't think in any way, Your
22 Honor.

23 JUDGE CHACHKIN: Prime Time was not carrying NMTV
24 programming, was it? It was carrying --

25 DR. RAMIREZ: Not to my knowledge, Your Honor.

1 JUDGE CHACHKIN: -- TBN programming, right? It was
2 carrying TBN programming.

3 DR. RAMIREZ: Yes, Your Honor.

4 JUDGE CHACHKIN: So if Prime Time's debt was
5 forgiven, TBN would benefit. Because they would still have a
6 source, someone to carry their programming and someone to get
7 20 percent from. Is that right?

8 DR. RAMIREZ: I think you're accurate.

9 JUDGE CHACHKIN: Well, now you're telling me that
10 NMTV is independent from TBN. And I'm asking you considering
11 NMTV's financial state whereby they owe \$5 million to TBN, as
12 a businessman how would that benefit NMTV to forgive that
13 debt?

14 DR. RAMIREZ: Um-hum. I will admit that in the
15 light of all the proceedings that it would have been wiser for
16 me to either abstain from voting or require more information.
17 And that is not how I usually do things. It was just my first
18 meeting. I believe our goals were, were the same.

19 I had been helped. I went through college, you
20 know, because somebody cared for me. And they told me if you
21 want to repay us, try to help whenever you can. So I thought
22 I was doing that. Whether it was an unwise decision on my
23 part to, to vote, I wish I could stand here and say I
24 abstained, you see. So I will stand corrected in terms of the
25 process. But in no way was it to bow to anybody but to be

1 kind and charitable and to further a cause that I believe in.

2 JUDGE CHACHKIN: Well, it seems to me there could be
3 something short of forgiving the debt. For one thing, you
4 could perhaps stretch out the terms of repayment. You could
5 work out some kind of programming arrangement perhaps similar
6 to what TBN has to, with its affiliates.

7 You didn't have to -- I mean that, that was -- what
8 I'm trying to understand, you weren't the only one at this
9 meeting. You were there with Ms. Duff, and who else was
10 there?

11 DR. RAMIREZ: Dr. Crouch --

12 JUDGE CHACHKIN: Dr. Crouch.

13 DR. RAMIREZ: -- Dr. Hill.

14 JUDGE CHACHKIN: Dr. Hill. Now did they tell you --
15 I mean you were a newcomer. Did they in any way tell you the
16 pros and cons of forgiving this debt and how it would benefit
17 NMTV in any way?

18 DR. RAMIREZ: No, Your Honor. And I did not ask.
19 And I do stand corrected on that.

20 JUDGE CHACHKIN: And did anybody raise the
21 possibility of something short of forgiving the debt such as
22 some kind of program arrangement or stretching out the
23 payments or something else which would benefit NMTV who was
24 then in, owed \$5 million to TBN?

25 DR. RAMIREZ: In my perception like I said, this was

1 the end of a process and that these possibilities I assumed,
2 perhaps wrongly, that they had been explored. And --

3 JUDGE CHACHKIN: Did anybody raise the question that
4 perhaps since TBN was going to benefit by at least continuing
5 to receive revenue that perhaps there should be some kind of
6 arrangement whereby TBN in, in consideration for NMTV
7 forgiving the debt that TBN should then forgive a portion of
8 NMTV debts, debt or, or provide them with a portion of the
9 revenue which TBN was receiving from Prime Time? Did that
10 come up?

11 DR. RAMIREZ: If it did, it probably did before I
12 was in that meeting.

13 JUDGE CHACHKIN: But nobody brought this up at the
14 meeting. The only thing that came up at the meeting was to
15 forgive Prime Time's debt.

16 DR. RAMIREZ: At this particular meeting, yes, and
17 the assumption that other possibilities, or that's what I
18 assumed, had been explored.

19 JUDGE CHACHKIN: Well, did anyone bring up at this
20 meeting any other possibilities short of forgiving the debt?

21 DR. RAMIREZ: Not that I can recall perhaps. But I
22 cannot recall, Your Honor.

23 JUDGE CHACHKIN: Well, do you recall such a, such a
24 consideration being --

25 DR. RAMIREZ: No, I don't.

1 JUDGE CHACHKIN: -- being brought up? Your answer
2 is no. Is that correct?

3 DR. RAMIREZ: That is correct, Your Honor.

4 JUDGE CHACHKIN: Go ahead.

5 MR. MCCURDY: I have no further questions.

6 JUDGE CHACHKIN: You have any redirect, counsel?

7 MR. TOPEL: No.

8 JUDGE CHACHKIN: You're excused. Thank you very
9 much.

10 DR. RAMIREZ: Thank you, Your Honor.

11 (Whereupon, the witness was excused.)

12 JUDGE CHACHKIN: We have another witness. We'll
13 take a 10-minute break at this time, then we could have the
14 next witness.

15 (Off the record at 2:55 p.m. Back on the record at
16 3:05 p.m.)

17 JUDGE CHACHKIN: Back on the record.

18 MR. TOPEL: Your Honor, I'm sorry. I need just 60
19 more seconds.

20 JUDGE CHACHKIN: All right. Let's stay off the
21 record.

22 (Off the record.)

23 JUDGE CHACHKIN: Back on the record.

24 MR. TOPEL: Thank you, Your Honor. I call to the
25 witness stand Philip David Espinoza.

1 Whereupon,

2 PHILIP DAVID ESPINOZA

3 having been first duly sworn, was called as a witness herein
4 and was examined and testified as follows:

5 DIRECT EXAMINATION

6 BY MR. TOPEL:

7 Q Sir, would you state your full name for the record,
8 please?

9 A Philip David Espinoza.

10 Q Thank you. And what is your residence address?

11 A 14154 Raven Street, Sylmar, California.

12 Q Thank you. Pastor Espinoza, I am showing you a
13 document that has been received into evidence in this
14 proceeding as Trinity Broadcasting of Florida Exhibit 106.
15 There's the title, Testimony of David -- of Philip David
16 Espinoza. And I'm directing your attention to the supporting
17 declaration that appears following page 19. And my question
18 to you, sir, is that your signature on that supporting
19 declaration?

20 A Yes, sir, it is.

21 Q And does this document constitute your direct
22 testimony in this proceeding to the Federal Communications
23 Commission?

24 A Yes, it does.

25 MR. TOPEL: Thank you. Your Honor, I believe the

1 witness is available for examination.

2 JUDGE CHACHKIN: Should we go off the record while
3 you explain to him about the --

4 MR. TOPEL: Oh, thank you.

5 JUDGE CHACHKIN: We'll go off the record.

6 (Back on the record.)

7 JUDGE CHACHKIN: -- the record. Mr. Cohen, cross-
8 examination.

9 CROSS-EXAMINATION

10 BY MR. COHEN:

11 Q Welcome to not so sunny Washington, Pastor Espinoza.

12 A Thank you, sir.

13 Q How did you prepare, sir, for today's session? How
14 did you get ready? What did you do?

15 A I went over my testimony.

16 Q With Mr. Topel. Or by yourself.

17 A Well, basically I did it in my hotel room.

18 Q Did you, did you prepare in any other way other than
19 reviewing your testimony?

20 A Yes. I went over it in the presence of Mr. Dunne.

21 Q And did you prepare in anything else you did or was
22 that it?

23 A I believe that's it, sir.

24 Q Your -- would you look at the supporting
25 declaration. It's at the very end of your testimony. The

1 last page. Mr. Topel just brought that to your attention.
2 And you see there it says that the testimony was of Philip
3 David Espinoza was prepared by me. You see that?

4 A Yes, sir.

5 Q Now did you actually sit down and, and write out
6 these 19 pages?

7 A Not all of them.

8 Q What did you mean when you said that the testimony
9 was prepared by you?

10 A Everything contained in my testimony are my
11 thoughts, my, the information that I have in my memory.

12 Q Tell me the process, if you will, how this testimony
13 was actually put together. Would you, would you tell me how
14 it came about?

15 A The first time that I met Mr. Dunne, I believe we
16 met in Los Angeles at the Bonaventure Hotel. Thereafter we
17 met another time in my church office in San Fernando. A third
18 time was again with Mr. Dunne and Mr. Topel. And I would
19 answer their questions, and they were taking notes as well as
20 I was taking notes.

21 Q Then they prepared a draft?

22 A Yes, sir.

23 Q And submitted it to you?

24 A Yes, sir.

25 Q And you reviewed it?

1 A Yes, I did.

2 Q And did you make any changes in it?

3 A I, I believe, I believe they were very minor
4 details.

5 Q Editorial changes?

6 A Yes.

7 Q Spelling type changes?

8 A Well, just for example number one, since 1952 I had
9 worked at and now I am the pastor -- that church. It should
10 have been 1956. Things like that.

11 Q And then -- so then you pointed out these
12 inaccuracies and then, and then they sent you another version,
13 another document, and you read it and signed it? Is that the
14 way it worked?

15 A Something along that line. I would make
16 corrections. I would try to remember what I said. And
17 because I wanted to make sure that whatever is, is here
18 reflects really what, what I said.

19 Q How many drafts did you receive before you signed
20 it?

21 A It may have been just the one, Mr. Cohen. I'm not
22 sure. But I'd be surprised if it was more than one, Mr.
23 Cohen.

24 Q Thank you. Now in preparing for your testimony here
25 today, I, I imagine you've read your deposition, haven't you?

1 A Recently?

2 Q Recently. When did you read it last?

3 A Yeah, I read it when I first received it I believe.

4 Q Yes. Have you read it since then?

5 A No.

6 Q I, I -- are you aware that there are -- there is

7 testimony, written testimony of persons other than yourself

8 that's been presented by, by NMTV and Trinity? You're not the

9 only witness.

10 A I understand, sir.

11 Q Have you had occasion to look at the testimony of

12 any other, the written testimony of any other person?

13 A Oh, no, sir. Not at all.

14 Q So the only testimony that you reviewed is your own.

15 A Only mine.

16 Q Now I want to bring you back to, to the time that

17 you were involved in the program "Felicidad" and, and perhaps

18 you'll look at paragraph 4 of your testimony on page 2.

19 A Yes, sir.

20 Q Just read paragraph 4 to yourself, and tell me when

21 you've read it.

22 (Pause.)

23 A Paragraph 4.

24 Q Yes.

25 A Yes, sir.